

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KEITH D. WASHINGTON,
Plaintiff

DOCKET # 04-12141DPW

Vs
Massachusetts Commission Against Discrimination

MARY C. GARIPPO, in her individual and official
Capacity as Investigator at Massachusetts
Commission Against Discrimination;

KATHERINE M. MARTIN, ESQ. in her individual and
Official Capacity as Supervisor at Massachusetts
Commission Against Discrimination;

DOUGLAS T. SCHWARTZ, in his individual and official
Capacity as Investigating Commissioner, at
Massachusetts Commission Against Discrimination;

DORCA I. GOMEZ, in her individual and official
capacity as Chairwoman at Massachusetts Commission
Against Discrimination

Defendant(s)

**PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION**

I. INTRODUCTION

For all the reasons stated in the attached "Memorandum In Support of Plaintiff's Motion For Preliminary Injunction", Keith D. Washington, Plaintiff respectively request this Court to issue a preliminary injunction for the relief requested.

Specifically, Plaintiff request that this Court enter an Order:

- a. ***Directing*** that Plaintiff may obtain on an expedited basis discovery (including depositions) from all individual Defendants regarding financial assets available or to be available to satisfy a judgment in favor of Plaintiff.

b. ***Restraining*** individual Defendants (and their assignees and/or representatives acting on their authority), directly or indirectly, from entering into any agreement and/or transaction to dispose of any assets in an amount greater than \$5,000.00, excluding normal living expenses, without providing contemporaneous notice of the terms of such agreement and/or transaction to the Court and Plaintiff.

Submitted: December 10, 2004

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